

September 3, 2020

**VIA FOIAonline**

U.S. Environmental Protection Agency  
FOIAonline.gov

**Re: Freedom of Information Act Request**

**Alicia M. Ramirez, et al. v. Ajax Magnethermic Corporation, et al.**

Los Angeles County Superior Court Case No. 20STCV22671 (JCCP4674)

Our Client: Avon Products, Inc.

Dear Custodian of Records:

We are requesting the disclosure of the following records pursuant to the Freedom of Information Act (5 USCS § 552), within the next twenty business days. All requested records pertain to the following locations:

- **1928 Jewelry Company, 3000 Empire Ave, Burbank, CA 915041 from 1973-1974.**
- **Jolie Petite, Inc., 1530 Church Road, Montebello, CA 90640 from 1975-1977.**
- **Iberia Jewelry Design, Inc. 1534 S. Figueroa, Los Angeles, CA 90015 from 1980-1981.**
- **Aro Industries, Inc., 550 Crocker St., Los Angeles, CA 90013 from 1980-1981**
- **Dhy, Inc., 922 Duncan Ave., Manhattan Beach, CA 90266 from 1989-2002.**
- **Nissan of Torrance, 20550 Hawthorne Blvd, Torrance, CA 90503 from 1990-2002.**

(1) Any records or documents<sup>1</sup> pertaining to the management plans, practices, safety procedures, construction, maintenance, rebuilding, and/or repair/remodeling work at the location above, which in any way involved asbestos.

(2) Any records or documents identifying any and all persons, contractors, or other entities who is involved in the practices, safety procedures, construction, maintenance, rebuilding, and/or repair/remodeling work at the location above, which in any way involved asbestos.

(3) Any records or documents pertaining to any asbestos cleanup work or industrial chemical cleanup work performed at the location above.

(4) Any records or documents regarding research, investigations, air testing, reports and/or study data from air testing and air sampling which measured the amount of asbestos fiber either in the ambient air and/or released when asbestos was used, machined, operated, or otherwise disturbed at the location above.

(5) Any records, documents, or letters to or from the Occupational Safety & Health Administration pertaining to warnings, citations, or violations at the location above, which in any way involved asbestos.

(6) Any records or documents, including but not limited to reports, studies, and/or secondary research provided by the Occupational Safety & Health Administration which addressed the issue of health hazards created by or associated with exposure to asbestos at the location.

(7) Any written communication from the Occupational Safety & Health Administration at the location, which in any way involved asbestos.

5 USCS § 552(b) allows you to segregate material that is exempt from material that is not exempt. If you determine that some portion of the requested documents is exempt, please provide me with the remainder of the documents. If you determine that some of the documents are exempt from release, please justify withholding of those records by demonstrating that the records are

---

<sup>1</sup> The term “record” and the term “document” are used in the broadest sense possible and mean the original and any non-identical copy (e.g., any copy which is different from the original in any way) of any written, recorded, printed, typewritten, or handwritten matter of any kind or nature (however produced, reproduced, or recorded), including but without limitation, all blueprints, work specifications, daily reports, time cards, letters, telegrams, e-mail, facsimiles, memoranda, reports (preliminary and final), studies, samples, testing protocols, diaries, logs, maps, pamphlets, notes, charts, graphs, calendars, schedules, tabulations, analysis, statistical information, accumulations, books, magazines, telephone bills, minutes, summaries, or other records of meetings, conversations, and hearings of any kind, photographs, slides, videotapes, film impressions, data, data compilations, computer files, computer documents, audiotape recordings, magnetic tapes, sound or mechanical reproductions, computer printouts, contracts, drafts of contracts, leases, subleases, instruments, agreements, warnings, directives, instructions, citations, violations, drawings, hearing transcripts, reports, summaries of investigations or negotiations, opinions or reports of consultations, consultants, or proposed experts, and press releases, now or at any time in your possession, custody, or control or known or believed by you to exist or have existed. “Record” or “document” also includes any underlying documents used to create summaries or other reports of financial or other data.

exempt or that the public interest in confidentiality outweighs the public interest in disclosure. We reserve the right to appeal any such determination.

We agree to pay the reasonable costs involved in retrieving and copying the records requested. If there are any fees for searching or copying these records, please inform me if the cost will exceed \$100.00. This information is not being sought for commercial purposes.

5 USCS § 552 requires a response time within twenty (20) business days. If access to the records we are requesting will take longer than this amount of time, please contact me with information about when we might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

If you have any questions, please feel free to contact me at (213) 486-8046 or by e-mail at **[rkim@hpylaw.com](mailto:rkim@hpylaw.com)**.

Sincerely,

**HAWKINS PARNELL & YOUNG LLP**

A handwritten signature in blue ink, appearing to read 'RcP', is positioned above the printed name.

Raymond Kim